

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED
JOHN P. HEHMAN
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U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
EAST. DIV. COLUMBUS

UNITED STATES OF AMERICA, :

Plaintiff :

vs. : CASE NO. 2:11-cr-010(1)

SEAN MURPHY, : JUDGE SMITH

Defendant :

DECLARATION OF JOSEPH M. MORGAN

I, Joseph M. Morgan, state the following:

1. Prior to going to do the BRINKS burglary, Robert Doucette purchased a MILWAUKEE Electromagnetic Drill for @\$2,500 in Woburn, MA. This drill was attempted to be used on a 6ft. safe inside BRINKS at 1362 Essex Avenue, Columbus, Ohio. I later placed this drill inside the "first" Raymond, NH, storage bin after retrieving the stolen money and tools from Ohio.
2. On January 3, 2009, me and Sean Murphy drove to Western Pennsylvania (PA) and rented a storage bin. We placed all the crime tools in this bin on that date.
3. After me and Murphy unloaded the crime tools in the PA storage bin, we drove over the border into Eastern Ohio and rented another storage bin that all the stolen money from BRINKS was going to go inside. The reason being that BRINKS may have GPS units hidden inside their packets of money. We could, therefore, unload the money into the Ohio storage bin rather quickly, lock the bin, go to the PA storage bin and unload the crime tools which would take alot longer, then drive home empty.
4. On January 16, 2009, we left Lynn, MA, to go do BRINKS. When we got to the storage facility in Western, PA, the three of us stayed in a Hotel (Comfort Inn) less than ten minutes away from the storage facility. (A picture of the Hotel we stayed at is attached)
5. On January 17, 2009, after arriving at BRINKS, I cut four holes in BRINKS' roof using a MILWAUKEE plug-in sawzall. I later placed this sawzall inside the "first" Raymond, NH, storage bin after retrieving the crime tools and stolen money from Ohio.
6. We entered BRINKS' building above the cash vault inside the Vault Room. In order to get into the garage area all we had to do was unlatch the doors by hand because

we were already in the Vault Room. No other procedure was necessary to open the doors leading out to the garage area.

7. Robert Doucette used a 12 ft. A-frame ladder inside BRINKS to release the rear garage door opener so that the garage door could be opened and closed by hand. All three of us used this same ladder to lug the industrial fan onto and off of BRINKS' roof.

8. After we left BRINKS, we brought the tools, stolen money and other stolen items to the Ohio storage facility and unloaded everything in the storage bin. The crime tools were supposed to go in the PA storage bin. However, because the gate was stuck open 24 hours, we decided to put everything in the Ohio storage bin.

9. We made the decision to stay at the same Hotel (Comfort Inn) in Western, PA that we had stayed in on January 16, 2009. We checked in the Hotel again on January 18, 2009. We all ate at the steak house right next door to the Comfort Inn Hotel (Lone Star Steak House).

10. At no time during the casing of BRINKS, or while breaking into BRINKS, would we stay at a Hotel [in] the state of Ohio. This would make any subsequent investigation more difficult for authorities. All storage bins and Hotel were near state lines.

11. We then used the rent-a-car to drive back to BRINKS to see if any BRINKS employees were able to enter the building because we had epoxy-glued the doors shut.

12. After observing BRINKS was a major crime scene, we drove back to the Comfort Inn Hotel in Western, PA and stayed the night.

13. On January 19, 2009, we checked out of the Comfort Inn Hotel and drove back to Lynn, MA, empty as planned. Nothing taken from BRINKS came back to Lynn.

14. Me and Robert Doucette snorted crushed up 80 mg Oxycontin pills together on January 16, 17, 18, 19, 2009, and also on January 23, 24, 2009, when we went back to Ohio to retrieve the items from the Ohio storage bin.

15. Once we returned home to Lynn, MA, on January 19, 2009, at @ 7:00pm, we all went home to get some sleep. Robert Doucette took the rent-a-car home with him.

16. On January 20, 2009, we brought the 24 ft. BUDGET moving truck to Robert Doucette's house for cleaning. David Nassor cleaned the front cab area of the truck and we cleaned the cargo area with soap, water and Simple Green cleaner.

17. Due to the manner in which Doucette's neighbors parked their vehicles on the street, we were unable to maneuver the 24 ft. BUDGET truck out of Doucette's yard on January 20, 2009.

18. On January 21, 2009, the BUDGET moving truck was driven out of Doucette's yard and David Nassor was responsible for returning the truck to the truck rental center

in NH.

19. On January 23, 2009, Murphy was arrested, when state police and FBI raided Murphy's home and moving warehouse in Lynn, MA.

20. Robert Doucette wanted to go to Ohio to retrieve the stolen money due to Murphy's arrest. So me and Robert Doucette drove to Ohio using a 24 ft. UHAUL moving truck his friend James Hennessey rented for him on January 23, 2009.

21. Once the items were retrieved from Ohio, we needed a place to put the heavy steel coin racks and video recording units stolen from BRINKS. I suggested that we put them in the PA storage bin knowing the rent on the bin had been prepaid for several months in advance.

22. On January 24, 2009, me and Robert Doucette pulled into the Western, PA storage facility through the "exit" gate because the gate was still stuck open.

23. We had previously stashed the key to the Western PA storage bin inside an overhead door flashing next to Bin 124. We could not find the key so we then disassembled the entire door flashing to try to locate the key. The key was not there so we re-assembled the door flashing and drove back to Lynn, MA with all the tools, money and stolen items from BRINKS.

24. Me and Robert Doucette unloaded all the crime tools, stolen coin and crime clothes in a storage bin in Raymond, NH, that James Hennessey had rented for Doucette.

25. Me and Robert Doucette brought the paper currency, digital money counter, steel coin racks, and video recording units back to Lynn, MA from the Raymond, NH storage bin.

26. Robert Doucette rented a storage bin at UHAUL Storage in Lynn, MA, on January 23, 2009, where we temporarily stored the items taken out of the Raymond, NH storage bin. Robert Doucette rented the storage bin under the name George Bogart. Robert Doucette's nickname is "Bogart" because he always hogarts (hogs) joints. My nickname is JoMo and my alias is John Lynch.

27. On January 26, 2009, me and Robert Doucette began counting the stolen money and separating the partially burned money from the unburned money. We did this for the next three days straight.

28. The total count of unburned paper currency stolen from BRINKS was @ \$420,00. The total count of stolen coin was @ \$425,000. The total amount of partially burned money was well over \$225,000.

29. All the unburned money was kept at Robert Doucette's house. All the partially burned money was bagged up and brought to the Lynn storage bin at UHAUL Storage. No money was destroyed or thrown away.

30. Robert Doucette took his laptop computer that he researched BRINKS with and drove over it in his driveway with my Chevrolet Tahoe truck. The laptop was demolished.
31. Sometime in February 2009, me and Robert Doucette cut up the heavy steel coin racks in Doucette's yard with a cutting torch. Doucette knew a local salvage guy who came and took the steel from his yard.
32. In June 2007, I purchased all the equipment for the Thermolance set up that cut through BRINKS' vault.
33. Only the cell phone jammer David Nassor picked up in Memphis, TN was taken to Ohio. Murphy's 100 Watt cell phone jammer was at Doucette's house in a blue flight container on the weekend of January 17-18, 2009.
34. The crime clothes are always re-used and kept with the tools and equipment. I did not remove the crime clothes from the Raymond, NH storage bin.
35. The FBI approached me to cooperate and I refused to speak with them.
36. Murphy requested that I testify on his behalf at trial and I told Murphy that if I was called as a witness I would invoke my Fifth Amendment rights.
37. After reading Robert Doucette's trial testimony, I cannot allow all the lies Doucette told at Murphy's trial to stand. This is why I am now providing this affidavit. Justice so requires.

I, Joseph Morgan, declare under penalty of perjury that the foregoing is true and correct.



Joseph M. Morgan

Dated: May 14, 2012

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